

EXHIBIT 11

Barbara Brown

10/11/2006

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

-----x

IAN BROWN, JAMES BROWN and
BARBARA BROWN,

Plaintiffs,

-against- Civil Action
No. 04cv1192-RGS

UNITED STATES OF AMERICA, VERIZON
NEW ENGLAND, INC., and BOSTON
EDISON COMPANY d/b/a NSTAR ELECTRIC,

Defendants.

-----x

October 11, 2006
9:48 a.m.

Deposition of BARBARA BROWN, taken by the
Defendants, pursuant to notice, held at
Manheimer & Charnas LLP, 747 Third Avenue,
New York, New York, before Tracy Eckhoff, a
Shorthand Reporter and Notary Public within and
for the State of New York.

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**Q. And these are your answers to
Verizon's first set of interrogatories?**

4

A. Correct.

5

**Q. Could you turn to the second page,
and I'll direct your attention to Interrogatory
No. 4, and the last sentence of your answer reads,
We also had to take a home equity line of \$24,000
for making our home accessible, constructing deck
with ramps and widening our driveway to
accommodate chair and cars.**

12

**Those are expenses you incurred in
making your home accessible for Ian; is that
right?**

15

A. Yes.

16

**Q. And you took a home equity line of
credit to do that?**

18

A. Yes.

19

**Q. Now, it was your understanding that
from the settlement you pocketed or you wound up
with about 178,000 and then you -- and that was in
2001, and then in 2002, I believe you said, you
purchased ~ 2001 you also purchased the home in
Neptune?**

25

A. Yes.

20

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A. That 24,000 home equity is included in our debt.

Q. Perhaps I didn't ask my last question right. Do you know how much is remaining to be paid down on the home equity line?

A. No.

Q. Do you know what your monthly payment is on that?

A. An approximate?

Q. Yes.

A. Between 250 and 300 dollars

Q. In addition -- other than the home equity line, have you incurred any other debt in order to make the home accessible for Jan?

A. Yes.

Q. And how much, approximately?

A. A best guess estimate would probably be about three to 5,000, I would imagine.

Q. And is that credit card debt?

A. The improvements were put on credit cards

Q. And what were those improvements?

A. The house that we purchased had two very small bathrooms. The second bathroom

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1 BARBARA BROWN
2 adjacent to our washing machines was very tight
3 and narrow. They had to be expanded to allow
4 Ian -- to accommodate him in his wheelchair for
5 showering and bathroom purposes. There were
6 renovations made to accommodate the chair in that
7 bathroom.

8 Q. Now, it says in Interrogatory No. 4
9 that you -- that there was a loss of personal sick
10 and vacation time for Barbara Brown.

11 You exhausted your personal sick and
12 vacation time?

13 } A Yes

14 Q. Now, it says that \$450 per week for
15 the year of 2002 at five weeks

16 What were the five weeks' vacation
17 that you took off? Was that immediately after the
18 accident?

19 A. They began on the day of the
20 accident.

21 Q. And did you take five weeks off at
22 one -- in one chunk of time?

23 A. Yes.

24

O. Okay.

25 And then did you have to return to

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1 **BARBARA BROWN**

2 MS. JOHNSON: Thank you.

3 THE WITNESS: You're welcome.

4 MR. CHARNAS: Two minutes is all I
5 need.

6 (A recess was taken.)

7 EXAMINATION BY MR. CHARNAS:

8 **Q. Mrs. Brown, how much in total,**
9 **approximately, does Ian contribute on a monthly**
10 **basis to the household?**11 A. My best guess estimate would probably
12 be between about 550 and maybe 650 dollars.13 **Q. Per month?**

14 A. Per month.

15 **Q. Did Ian ever reimburse you for the**
16 **expenses of improving the house and property to**
17 **make it more handicap accessible?**

18 A. No.

19 **Q. Do you have a land-line telephone in**
20 **your house?**

21 A. I do.

22 **Q. Does Ian ever use that telephone?**

23 A. Yes.

24 **Q. Does Ian pay for that telephone?**

25 A. No.